

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA
Plaintiff

CRIMINAL NO. 21-161 (PAD)

v.

[1] FÉLIX VERDEJO-SÁNCHEZ
Defendant

SENTENCING MEMORANDUM

TO THE HONORABLE COURT:

COMES NOW defendant **FÉLIX VERDEJO-SÁNCHEZ [1]**, through the undersigned attorneys, and very respectfully STATES, ALEGES, and PRAYS:

I.

After a 25-day Jury trial, Mr. Verdejo-Sánchez was found guilty on two out of the four counts charged. That is, Verdejo-Sánchez was found guilty in Counts 2 and 4; to wit, kidnapping resulting in death and killing of an unborn child.¹

Both counts of conviction carry a mandatory minimum term of life in prison. Accordingly, this Court is bound to the strict application of the statutes² and as such, must sentence Mr. Verdejo-Sánchez to life in prison.

Therefore, mitigating factors and circumstances that the defense ordinarily presents at sentencing are futile in this case.

¹ Docket Entry No. 825

² To wit, 18 U.S.C. §§ 1201(a)(1) and 2 as to the *kidnapping offense* (Count 2), and 18 U.S.C. §§ 1841 and 2 as to the *unborn child offense* (Count 4).

II.

Nevertheless, if Verdejo-Sánchez were not subject to a mandatory sentence of life in prison, we would argue in favor of mitigation and would request that the Court considers the following factors in determining an adequate sentence that complies with the sentencing factors in 18 U.S.C. § 3553(a): his young age, his 6-year-old dependent daughter, his professional career as a boxer and Olympic athlete, lack of criminal history, lack of substance abuse history, community service activities, his excellent ties to the community, and familial support and relationships.

III.

Mr. Verdejo-Sánchez renews and preserves all objections made during trial and every argument raised in his Rule 29 motions³.

WHEREFORE, it is respectfully requested that this Honorable Court considers the argument above when sentencing Félix Verdejo-Sánchez.

I HEREBY CERTIFY that on this date, this document was filed using the CM/ECF filing system, which will send notification of such filing to all counsel of record.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, on October 25, 2023.

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³ Docket Entries No. 696 and No. 840